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March 16, 2022

Via ECF

Hon. Laura Taylor Swain
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: United States v. Constantinescu, et al., 19-cr-651 (LTS)

Your Honor:

I am counsel to Iuliana Mihailescu, a defendant in the above reference case. I write to request a one-time bail modification to permit Ms. Mihailescu to travel to Florida in April 2022. Her Pretrial Services Officer, Dominique Jackson, has informed counsel that as long as the court grants approval, Pretrial Services has no position on the defendant's travel, and the government has informed defense counsel that it defers to Pretrial Services.

The Court previously granted a similar request on October 20, 2021 for anticipated travel in December 2021. See ECF # 902. Unfortunately, Ms. Mihailescu's daughter got COVID-19 and the family did not travel to Florida in December 2021. They would like to reschedule this trip for April 14 – 23, 2022.

Her arrival date in Florida would be April 15, 2022 and her departure date would be April 22, 2022. To save money, the family would travel by car, and stop one-night each on the way there and the way back. If this request is approved, Ms. Mihailescu will provide her full itinerary, including where the family intends to stop on the way there and on the way back, to her Pretrial Services Officer, as well as check-in as requested by Officer Jackson.

Accordingly, we respectfully request that the Court modify Ms. Mihailescu's current bail conditions to permit her to travel from April 14, 2022 through April 23, 2022 to Florida, making two overnight stops during the travel time-period.



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I thank the Court for its attention to this matter.

Respectfully submitted,

/s/

Dawn M. Cardi

cc: All Parties (via ECF)
Pre-Trial Services Officer Dominique Jackson (via e-mail)

The foregoing request is granted. Dkt. no. 1027 resolved.
SO ORDERED.

3/17/2022

/s/ Laura Taylor Swain, Chief USDJ